



QA-17573

YELLOW FREIGHT SYSTEM, INC.

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FHWA Docket NO MC-92-10
Room 4232, HCC-10
Office of the Chief Counsel
Federal Highway Administration
400 Seventh Street, SW
Washington, DC 20590

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Enclosed are the outlines of Yellow Freight's triples driver training programs utilizing the experience of the training we conducted for operations on the Ohio Turnpike and the Indiana Toll Road. There are both outlines of training itself and instructions to the driver trainer on what the course seeks to achieve.

The enclosed video is an overview of the training program and is not a training video in and of itself. As discussed in the video and the training outlines, Yellow utilizes other videos and training materials within the course. We tailor each training session to the rules and regulations applicable in the locations where the drivers will be operating.

Warren E. Hoemann
Vice President - Government Relations

See Supp Info File
for video and
training materials

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BEFORE THE

U.S. DEPARTMENT OF TRANSPORTATION

FEDERAL HIGHWAY ADMINISTRATION

MANDATORY MINIMUM TRAINING REQUIREMENTS

FOR OPERATORS OF LONGER COMBINATION VEHICLES (LCVs)

FHWA DOCKET NUMBER MC-92-10

COMMENTS OF YELLOW FREIGHT SYSTEM, INC.

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Yellow Freight System (Yellow) is a transportation company operating in all 50 states, Canada, Mexico, Puerto Rico and Europe. Yellow is one the largest users of **LCVs** in the form of triple trailer combinations (three 28-ft. trailers) in the nation, operating an average of 15 million miles a year in 14 states.

Through the operation of triples, Yellow saves 900,000 gallons of fuel annually and avoids 7.5 million miles of operation that would otherwise be necessary if triples were not authorized. The productivity and efficiency afforded by triples saves our company approximately **\$12,000,000** in operating costs annually. In today's competitive markets, those cost savings are passed on directly to shippers and consumers.

By far our most important triples statistic, though, focuses on safety. We are justifiably proud of our overall fleet safety record of 0.41 **USDOT** - reportable accidents per million miles of operation. With triples, Yellow averages only 0.20 reportable accidents per million miles, twice as good as our own fine fleet performance.

To put that in layman's perspective, a person would have to drive his or her automobile 10,000 miles a year for 500 years without an accident to achieve the record set by Yellow triples operations.

Yellow supports the operation of triple trailer combinations by qualified carriers and qualified drivers only under state-issued special permits, subject to strict rules and regulations and designation of routes. Specifically, we support the recommendations of the TRB Truck Weight Study, Special Report 225. We feel that all states should have the ability in their discretion to issue divisible load special permits above 80,000 pounds gross weight on the Interstates. Federal axle weight limits and bridge formula should apply. We support state-by-state consideration of LCV authorization because states are in the best position to determine when and under what conditions LCV operations are appropriate. We do not seek a federal mandate of LCV or of triples specifically.

We do, on the other hand, fully support this Docket in its exploration of mandatory LCV driver training. Drive qualification and training is one area of LCV operation in which federal uniformity would be helpful. Motor carriers must be able to respond to changing markets and competition. Differing driver qualifications and training requirements from state to state would hinder that ability. Similarly, qualified drivers should have the ability to seek employment where it is available, knowing that their qualifications and training will meet a uniform standard.

Our most basic reason for supporting mandatory LCV driver training is safety. Yellow has always met existing state driver training requirements and we have always road tested candidate triples drivers before allowing them to operate on their own. Recently, we upgraded our own triples driver training program to include classroom, off-highway and road test elements. This curriculum was introduced for our triple trailer operations on the Ohio Turnpike and Indiana Toll Road and is now being introduced to each of our driver domiciles where we operate triples.

Our triples driver training program was designed by veteran safety supervisors with years of experience in the operation of triples and road testing of drivers. It utilizes written materials, instructional videos, demonstration and hands-on training in vehicle handling characteristics, hooking and dropping the third trailer and triples' turning capabilities before a road test in the company of a qualified driver trainer. We are also sending to the Docket a copy of a typical driver training outline and an overview video of our triples driver training program.

Yellow also fully supports the efforts of the Professional Truck Drivers Institute of America (PTDIA) in their development of recommended driver training practices for triples. The special permit system under which triples operate has allowed states to fit the right vehicles on the right

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roads. With a uniform LCV driver training standard, we can also be assured that the right drivers are in place.

Years of actual field experience has demonstrated that **LCVs**, and triples specifically, operate safely, efficiently, and compatibly with other highway users. Now we must ask: How can we replicate this experience? How can we improve it? A uniform LCV driver training standard is **one** way to **answer** both questions.

QUESTIONS AND ANSWERS

1. Should the definition of LCV be expanded to include vehicles not covered by the ISTEA, such as "twin trailers" or "western doubles"?

The ISTEA legislation specified an exact definition of LCV that was arrived at after much debate in Congress. Yellow believes that the Congressional intent carries over to the LCV training requirement.

The definition should include the definition of an LCV which operates on the Interstate System, the definition of Trucks Over STAA Length on the National Network, and a listing of **CMV's** specifically excluded from the definition and the state in which it is excluded.

2. What difficulties would the ISTEA definition create from an enforcement standpoint in distinguishing which vehicles meet the definition and in determining which drivers must comply with any LCV training requirements?

Triple trailer combinations are only allowed under special permit, no matter their gross weight. Yellow foresees absolutely no difficulty or confusion from an enforcement standpoint in distinguishing that triples meet the **ISTEA definition** and that triples drivers must comply with LCV training requirements.

We believe that enforcement of carrier compliance with these training requirements should be carried out through the same compliance review process currently in place for DOT audit of carriers. Motor carriers should be required to maintain the documentation necessary of LCV driver training and that documentation should be subject to the random review DOT gives other carrier records. The qualification of LCV driver trainers should be similarly kept in motor carrier personnel files.

3. What should be FHWA's role in assuring that the training is actually carried out according to the minimum standards?

The FHWA focus should be on programmatic compliance by motor carriers through the compliance review process. It should be determined whether motor carriers have an LCV driver training program in place with qualified driver trainers and, through random review of driver personnel files, whether the documentation is being kept to verify that the mandatory does indeed take place. FHWA will know to look for this documentation by obtaining lists of special permit holders from the states which authorize **LCVs**. By focusing on a motor carrier's program, FHWA can avoid burdening carriers, like Yellow, who have LCV operations in several states, with multiple, repetitive audits.

4. What standards are necessary to ensure that instructors have been adequately and properly trained and are carrying out their training responsibilities in an acceptable manner?

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Motor carriers have the experience and expertise in the training of LCV drivers. FHWA should set minimum qualification standards for LCV driver training instructors, but those standards should be developed in concert with the industry itself. Clearly, an LCV driver trainer should be fully qualified on the type of LCV for which he is giving instruction. That would include passing written and road tests for the specific type of LCV. As with the training of LCV drivers, motor carriers should be required to document the exact time and place of training or grandfathered status of their LCV driver training instructors.

5. **Since LCV operations are allowed only under special state oversize/overweight permits, should the initial licensing of LCV instructors and certification of LCV drivers be accomplished by a federal or a state agency? How should this be accomplished?**

Yellow opposes mandatory federal or state licensing and certification of triples drivers. We support, instead, self-certification with federal and state audit of motor carrier programs to ensure compliance. As a very practical matter, the expertise in LCV driver training resides with motor carriers. Motor carriers also have a direct interest in having qualified drivers operating their LCVs. We simply feel that federal or state certification of LCV driver training is unworkable.

6. **From an enforcement perspective, what specific federal, state or local agencies should have the responsibility for assuring that the requirements of LCV training are met and what form of documentation should be established to prove to perspective employers that adequate LCV training has been successfully completed by a driver? Who should be held accountable if the driver training requirements are not met?**

The DOT compliance review process, as conducted by federal and state inspectors, should be utilized for ensuring that LCV driver training requirements are met. The forms of documentation should record the time, place and instructor of LCV driver training.

Some "portable" credentials should be developed to indicate that an individual driver is qualified. Portability of credentials will allow drivers to transfer between carriers or between locations of the same carrier and will allow carriers to utilize these transfers without incurring the expense of duplicative training.

In the long term, the back of the CDL could have a space to enter LCV driver training verification. Currently, however, the exact format of the CDL varies by state, so such a change would have to be made as CDLs are renewed and reissued. Similarly, in the long term, CDLIS (CDL Information System) could be utilized to maintain a central file of LCV-qualified drivers. Again, that is not immediately available.

In the short term, then, motor carriers and other qualified LCV driver trainers should be required to issue a permanent card to the individual driver. That card should note verification of LCV driver training, the carrier's ICC number and the date training was completed. The card should be required federally but issued by the carrier or qualified driver trainer and should then become the property of the individual driver unless revoked for cause. The individual cards will become the enforcement mechanism on the road for state officials.

Existing LCV driver trainers and LCV drivers should be grandfathered and issued a similar card without need for full training. A shortened review course should be

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adequate for existing LCV drivers and trainers. We see no value -- and great cost -- in road testing a current LCV driver or trainer, when that person may already work with LCVs on a routine basis.

Please note that our support for the long-term usage of the CDL or CDLS is to document and track **LCV-qualified** drivers, not to either require federal/state licensing or to make LCV driver training a CDL prerequisite.

7. Should non-profit, private organizations, such as PTDIA, be authorized to evaluate and certify the adequacy of LCV training programs?

PTDIA does excellent work in developing driver training curriculum. We believe that they and other private organizations have a role to play in helping motor carriers voluntarily establish their own LCV driver training programs where they do not already exist. In Canada, for example, government and industry have worked together jointly to offer training programs for carriers too small to maintain their own. However, we believe that compliance with a federal mandate, such as the mandatory LCV driver training, is a matter best left to FHWA enforcement. We have no objection to a motor carrier voluntarily submitting its driver training program to PTDIA for review. Mandatory audits should be reserved for government.

8. What types of LCV driver training programs exist?

Yellow has outlined our driver training program, with copies of pertinent materials enclosed.

9. Should implementation of the minimum training requirements for LCV operators be phased in over a certain period of time?

As with other recent federal motor carrier safety regulations, motor carriers should be given one or two years advance notice of the training requirements, depending upon the carrier size.

10. Should LCV training be a prerequisite for double/triple trailer endorsement on a CDL?

No. Triple trailer combinations specifically are only authorized in 16 states. It would be an enormous waste of motor carrier time and money to require triples driver training of drivers in the other 34 states or of drivers, such as city drivers, who may never operate triples. We estimate the value of Yellow's current triples driver training at \$400 per driver. This accounts for driver's wage and fringes, safety supervisor/driver trainer time, direct equipment operational costs and the loss of equipment utilization in **revenue-producing** activity. With a pool of 15,939 road drivers, city drivers, mechanics and others needing a CDL "double/triple" endorsement, Yellow cannot support a cost of **\$6,375,600** when only a much smaller, targeted group would actually operate triples.

In the long term, the back of the CDL could have a space to enter LCV driver training, as discussed under Question 6. We do not, however, support either federal/state licensing of LCV drivers or LCV driver training as a prerequisite to CDL "double/triple" endorsement.

11. Should all LCV drivers be required to have previous experience with single trailer vehicles? If so, how much?

Yellow's triples driver training program was designed with the experienced doubles

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driver as its foundation. While we may continue to require that our own candidate triples drivers first have experience in the operation of doubles, we believe that a federal standard of two years' verifiable commercial truck driving experience is workable and enforceable within the trucking industry generally.

We oppose triples driver training for entry level, novice drivers.

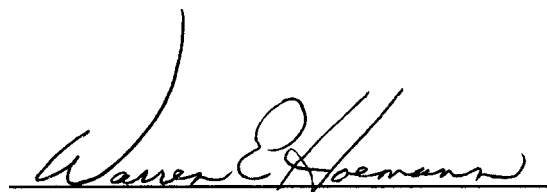
12. How often should LCV training be offered/repeated for both instructors and drivers?

LCV driver training should be required before the operation of LCVs by a driver and upon any significant change in motor carrier equipment that could affect the handling characteristics of the LCVs operated. (For example, changing tractor models would probably not require new training; changing trailer lengths significantly would.) Every LCV operator should be required to have an established safety program, which means ongoing review of defensive driving measures and analysis of accidents, for both drivers and instructors.

With a large pool of drivers already operating triples in a safe manner, Yellow believes that existing, experienced triples drivers and instructors should not be required to undergo the full triples driver training curriculum but instead should complete a shortened review course.

13. Do specialized vehicle combinations such as triples or those handling special cargo require different training standards?

The ISTEAs definition, as discussed under Question 1, should be the only standard utilized to require LCV driver training. LCV driver training should be tailored to the LCV configuration type being operated. That is one reason Yellow strongly believes that experience in the operation of doubles should be a prerequisite to training for the operation of triples. The cargo being carried should not affect LCV driver training.



Warren Hoemann
Vice President - Government Relations

March 16, 1993

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YELLOW FREIGHT SYSTEM

An Average Year With Triples

Miles Operated: **15 million.**

Safety Record: **1 reportable accident every 5 million miles.**

By Comparison: **Our overall fleet averages 1 accident every 2.44 million miles.**

The U.S. trucking industry as a whole averages 1 reportable accident every 909,000 miles.

Savings: **900,000 gallons of fuel annually.**

7.5 million miles of operation.

Approximately \$12 million in operating costs.



YELLOW FREIGHT SYSTEM

Doubles / Triples Comparison

DOUBLES

TRIPLES

GROSS
WEIGHT

80,000 #

105,500 #

INCREASED WEIGHT

31%

BRAKING
CAPACITY

5 axles

7 axles

INCREASED CAPACITY

40%

AVERAGE
AXLE LOADS

17,500 #

15,917 #

DECREASED AXLE LOADS

9%

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